

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

IN RE:	)	
	)	
MICHAEL WAYNE CRAWFORD,	)	Case No. 10-13604-RGM
	)	Chapter 11
	)	
Debtor.	)	
<hr style="width: 45%; margin-left: 0;"/>		
U.S. BANK TRUST, N.A., AS TRUSTEE	)	
FOR LSF9 MASTER PARTICIPATION	)	
TRUST,	)	
Movant,	)	
	)	
v.	)	
	)	
Michael Wayne Crawford, et al.	)	

**REORGANIZED DEBTOR’S RESPONSE TO MOTION FOR RELIEF FROM STAY**

COMES NOW, Michael Wayne Crawford (the “Debtor”), the reorganized debtor herein, and files the following response (the “Response”) to the “Motion for Relief From Automatic Stay” (the “Motion for Relief”), filed herein by U.S. Bank Trust, N.A. (“US Bank”), stating to the Court as follows:

**I. Background**

1. On May 3, 2010 (the “Petition Date”), the Debtor filed a voluntary petition under chapter 11 of the Bankruptcy Code, thereby commencing this case.
2. By Order entered on February 12, 2013, the Debtor’s Second Amended Plan of Reorganization was confirmed (the “Debtor’s Plan”).
3. On August 15, 2016, US Bank filed its Motion for Relief from the Automatic

Stay (hereinafter the “Motion”), seeking relief from the automatic stay in connection with the Debtor’s non-residence real property located at 3707 Masthead Trail, Triangle, VA 22172 (the “Property”).

## **II. Responses to Numbered Paragraphs of the Motion**

In response to the numbered paragraphs of the Motion, the Debtor states as follows:

4. Paragraph number One constitutes a statement of law and does not require a response. To the extent that a response is required, the Debtor admits the allegations and demands strict proof thereof.

5. As to Paragraph Number Two, Admitted.

6. As to Paragraph Number Three, Admitted.

7. As to Paragraph Number Four, Admitted.

8. As to Paragraph Number Five, Admitted as to the first sentence and Denied as to the second sentence.

9. As to Paragraph Number Six, Denied.

10. As to Paragraph Number 7, Denied.

11. As to Paragraph Number 8, Denied.

12. As to Paragraph Number 9, that paragraph sets forth a request to the Court and does not require an admission or denial. To the extent that a response is required, the Debtor Denies such paragraph.

13. As to Paragraph Number Ten, Denied.

## **III. Grounds of Defense**

14. The Debtor asserts that no cause exists for terminating, annulling, modifying or conditioning the automatic stay under Section 362(d)(1) or Section 362(d)(2) of the Bankruptcy

Code as it applies to the Property, and further asserts that ZU.S. Bank has failed to sufficiently allege or establish any cause in its Motion.

15. The Property is necessary to the Debtor's effective reorganization.

WHEREFORE, having fully answered the allegations contained in the Motion, the Debtor respectfully requests that the Court enter an order: (1) denying the Motion, and (2) granting such further relief as this Court may deem just.

Respectfully Submitted,

Michael Wayne Crawford

By counsel.

Raymond R. Pring, Jr., Esquire  
9431 Main Street  
Manassas, Virginia 20110  
(703) 366-3920

By: /s/ Raymond R. Pring, Jr.  
Raymond R. Pring, Jr., Va. Bar No. 39104  
*Counsel to Michael Wayne Crawford*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29<sup>th</sup> day of August, 2016, a copy of the Debtor's Response to Motion for Relief from the Automatic Stay was sent by ECF email and/or U.S. first-class mail, postage prepaid to the following:

M. Christine Maggard  
Brock & Scott, PLLC  
484 Viking Dr., Ste 203  
Virginia Beach, VA 23452

Office of the United States Trustee  
115 S. Union Street, Suite 210  
Alexandria, Virginia 22314

Michael W. Crawford  
13171 Quade Lane  
Woodbridge, Virginia 22193

/s/ Raymond R. Pring, Jr.  
Raymond R. Pring, Jr.